

**REPORT TO THE LEGISLATURE**

**Agency Fees for Review and Approval of  
Mental Health and Substance Use Disorder  
Treatment Programs**

**SUBSTITUTE SENATE BILL 5883  
Section 204, (4)(c) and  
Section 208(21)**

December 1, 2017

Behavioral Health Administration  
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## **BACKGROUND**

The 2017 Legislature passed SSB 5883, which requires the Department of Social and Health Services (DSHS), Behavioral Health Administration (BHA) to conduct an analysis of fees paid by licensed behavioral health agencies that support BHA's Licensing and Certification Section's review and approval of mental health and substance use disorder treatment programs. To the extent that fees charged in 2018 are not expected to fully cover the cost of the regulatory program, BHA must submit a report to the Office of Financial Management and the appropriate fiscal committees of the legislature identifying what further increases would be required and the differential impact on providers. This report must be submitted by December 1, 2017.

### SSB 5883, Section 208(21)

*In accordance with RCW 70.96A.090, 71.24.035, 43.20B.110, and 43.135.055, the department is authorized to adopt fees for the review and approval of mental health and substance use disorder treatment programs in fiscal years 2018 and 2019 as necessary to support the costs of the regulatory program. The department's fee schedule shall have differential rates for providers with proof of accreditation from organizations that the department has determined to have substantially equivalent standards to those of the department, including but not limited to the joint commission on accreditation of health care organizations, the commission on accreditation of rehabilitation facilities, and the council on accreditation. To reflect the reduced costs associated with regulation of accredited programs, the department's fees for organizations with such proof of accreditation must reflect the lower cost of licensing for these programs than for other organizations which are not accredited. To the extent that the fees charged in fiscal year 2018 are not expected to fully cover the cost of the program, the department must submit a report to the office of financial management and the appropriate fiscal committees of the legislature identifying what further increases would be required and the differential impact on providers. This report must be submitted by December 1, 2017.*

BHA administers the licensing and certification of behavioral health treatment agencies which regulate public and private substance use disorder, mental health, and problem and pathological gambling agencies. There are approximately 584 substance use disorder treatment programs and 202 licensed Community Mental Health Agencies offering services at 553 service sites statewide. During calendar year 2016, about 245,000 publicly-funded patients were served by these programs. In addition, thousands of Washington residents were served in private, for-profit agencies.

Current licensing and certification standards are driven by the Revised Code of Washington, Code of Federal Regulations, and federal block grants.

These standards were established to ensure:

- Quality health care services of equal intensity, duration, and scope.
- Quality management.
- Consistent application of clinical standards and practices.
- Consistent implementation of patient health and safety standards.
- Certified and licensed chemical dependency and mental health professionals are operating within the scope of their practice.
- Consistent risk management monitoring of substance use disorder treatment programs and community mental health agencies.
- Rapid response to complaints regarding substance use disorder treatment programs, community mental health agencies, and providers to ensure patient health and safety.

## **FEE ANALYSIS**

The Department conducted an analysis of fees paid by licensed behavioral health agencies that support the BHA Licensing and Certification Section review and approval of mental health and substance use disorder treatment programs. Fees paid by licensed behavioral health agencies are not expected to fully cover the cost of the regulatory program in FY 2018.

As part of Governor Inslee's Directive 17-11, BHA is working with the Department of Health to plan for the anticipated transfer of the Licensing and Certification Section from DSHS to DOH on July 1, 2018. BHA does not recommend increasing licensing and certification fees for behavioral health agencies in early 2018 because DOH will reassess agency fees to cover the cost of the Licensing and Certification Section regulatory program as part of behavioral health integration.

## **Revenue and Expense Assumptions**

Revenue and expense assumptions are attached as appendix B. The analysis includes an estimate of direct and indirect expenses for 23 positions (22 FTEs and 1 contract position) that have been identified as individuals that will transfer to DOH as part of Behavioral Health (BH) integration.

Revenue assumptions are based on a combination of agency fees collected from mental health (MH) and substance use disorder (SUD) treatment agencies. Currently BHA supplements fee revenue in order to cover the full cost of BHA's Licensing and Certification program. In order to increase MH agency fee collections the Legislature will need to increase its appropriation authority as it is currently capped at \$251,000 per year. Revenue assumptions also include differential fee collection recognizing accreditation by a federally recognized accreditation body. Appendix A is the current fee schedule with differential fees for accreditation agencies.

### **Revenue Required to Fully Cover the Cost of the Regulatory Program**

Because BHA will not collect sufficient agency fee revenue to cover the cost of its regulatory program in FY 2018, BHA will continue to use federal funding resources to supplement the Licensing and Certification budget.

In order to fully cover the cost of the Licensing and Certification regulatory program, BHA could have to increase revenue by the following amounts:

- MH Treatment Agency Program: \$877,160 per year
- SUD Treatment Agency Program: \$677,539 per year

### **Differential Impact on Providers**

To fully cover the cost of the Licensing and Certification regulatory program, BHA could be required to increase current fees as follows:

- Impact on MH agencies – Currently there are 202 mental health corporations providing treatment services at 553 service sites. Fee increases may vary depending on the level of care – outpatient services and residential services – offered at each service site factoring in differential rates for agencies that are also accredited by a federally recognized accreditation body. Current fees would need to be increased up to 2.62 times and therefore: *Agencies currently paying \$728 could have fees increased to \$1907. Agencies currently paying \$2575 could increase to \$6747.* Some MH residential treatment agencies such as Crisis Stabilization and Triage are not currently required by administrative rule to pay licensing fees which needs to be considered.
- Impact on SUD agencies – There are 585 licensed SUD treatment agencies. Fee increases may vary depending on the level of care – outpatient services and residential services – offered at each service site factoring in differential rates for agencies that are also accredited by a federally recognized accreditation body. Current fees would need to be increased up to 2.08 times and therefore: *Agencies currently paying \$1000 for a new agency application could see an increase up to \$2080. Agencies currently paying \$100 per licensed bed could have fees increased up to \$208 per licensed bed.*
- Other considerations: Currently there are 26 providers that offer Problem and Pathological Gambling Treatment services that are not currently required by administrative rule to pay licensing fees which needs to be considered.
- BHA currently licenses 553 MH treatment sites and 584 SUD treatment sites. Of these, 256 treatment sites offer both MH and SUD treatment services. There are 1191 licensed MH residential/hospital treatment beds and 3578 licensed SUD residential/hospital treatment beds. BHA could expect further analysis of various levels of care to ensure equably distribution of fee revenue expectations.

## APPENDIX A – APPLICATION & LICENSING FEES

### WAC 388-877-0365 - Fee requirements

Application Fees for Agency Certification for Approved Substance Use Disorder Treatment Programs	
New agency application	\$1,000
Branch agency application	\$500
Application to add one or more services	\$200
Application to change ownership	\$500
Initial and Annual Certification Fees for Detoxification, Residential, and Nonresidential Services	
Detoxification and residential services	\$100 per licensed bed, per year, for agencies not renewing certification through deeming
	\$50 per licensed bed, per year, for agencies renewing certification through deeming per WAC <a href="#">388-877-0310</a>
Nonresidential services	\$750 per year for agencies not renewing certification through deeming
	\$200 per year for agencies certified through deeming per WAC <a href="#">388-877-0310</a>
Complaint/Critical Incident Investigation Fees	
All agencies	\$1,000 per substantiated complaint investigation and \$1,000 per substantiated critical incident investigation that results in a requirement for corrective action

Initial Licensing Application Fee for Mental Health Treatment Programs	
Licensing application fee	\$1,000 initial licensing fee
Initial and Annual Licensing Fees for Agencies not Deemed	
Annual service hours provided:	Initial and annual licensing fees:
0-3,999	\$728
4,000-14,999	\$1,055
15,000-29,999	\$1,405
30,000-49,999	\$2,105
50,000 or more	\$2,575
Annual Licensing Fees for Deemed Agencies	
Deemed agencies licensed by DBHR	\$500 annual licensing fee
Complaint/Critical Incident Investigation Fee	
All residential and nonresidential agencies	\$1,000 per substantiated complaint investigation and \$1,000 per substantiated critical incident investigation that results in a requirement for corrective action

**APPENDIX A** *(Continued)*

**WAC 388-865-0511 & 0910 - Fee requirements**

Evaluation and Treatment Facilities and Competency Evaluation and Restoration  
Treatment Services:

- (4) Pay the following certification fees:
  - (a) Ninety dollars initial certification fee, per bed; then
  - (b) Ninety dollars annual certification fee, per bed.

No fees currently for Crisis Stabilization & Triage facilities.

No fees currently for Pathological Gambling Treatment service

**APPENDIX B  
LICENSING CERTIFICATION PROGRAMS  
EST. REVENUES AND EXPENDITURES from FY 2019 thru FY 2023**

<u>Mental Health Treatment Agency Programs</u>	<u>FY19</u>	<u>FY20</u>	<u>FY21</u>	<u>FY22</u>	<u>FY23</u>	<u>5 year Avg</u>
Estimated Program Costs	1,206,801	1,209,973	1,211,297	1,212,645	1,214,019	
Current Revenue Estimate (553 MH Service Sites- 202 Corporate Entities)	<u>333,787</u>	<u>333,787</u>	<u>333,787</u>	<u>333,787</u>	<u>333,787</u>	
<b>Additional Revenue Required if self-supported</b>	<b>873,014</b>	<b>876,186</b>	<b>877,510</b>	<b>878,858</b>	<b>880,232</b>	<b>877,160</b>

262% increase in fees needed

**\*\* Additional appropriation authority is needed to claim the full amount of revenue (currently capped at \$251,000)**

Note: Crisis Triage/Stablization does not currently have a fee schedule associated

**Comments**  
See Below  
Estimate is avg of FY15 FY16 FY17 actual revenue\*\*  
Total does not include add'l agencies or inflation  
Agencies currently paying \$728 could increase to \$1907  
Agencies currently paying \$2575 could increase to \$6747

<u>Substance Use Disorder Treatment Programs</u>	<u>FY19</u>	<u>FY20</u>	<u>FY21</u>	<u>FY22</u>	<u>FY23</u>	<u>5 year Avg</u>
Estimated Program Costs	1,287,369	1,296,059	1,297,444	1,298,855	1,300,292	
Current Revenue Estimate (580 CD Agencies)	<u>618,465</u>	<u>618,465</u>	<u>618,465</u>	<u>618,465</u>	<u>618,465</u>	
<b>Additional Revenue Required if self-supported</b>	<b>668,904</b>	<b>677,594</b>	<b>678,979</b>	<b>680,390</b>	<b>681,827</b>	<b>677,539</b>

208% increase in fees needed

Note: Crisis Triage/Stablization does not currently have a fee schedule associated

**Comments**  
See below  
Estimate is avg of FY15 FY16 FY17 actual revenue\*\*  
Total does not include add'l agencies or inflation  
Agencies currently paying \$1000 for a new agency application could need it increased to \$2080  
Agencies currently paying \$100 per licensed bed could have fee increased to \$208 per licensed bed

<u>ESTIMATED EXPENDITURES AT FULL CAPACITY:</u>	<u>FTE</u>		<u>FY19</u>	<u>FY20</u>	<u>FY21</u>	<u>FY22</u>	<u>FY23</u>	<u>Comments</u>
C9824 - Mental Health Treatment Programs	<b>9.0</b>	<b>A</b>	718,713	720,270	720,270	720,270	720,270	FY20-FY23 Assumes full COLA amt from 17-19 bien
(Includes 50% of total Admin costs - PI G9221)	<b>1.6</b>	<b>B</b>	274,545	274,860	274,860	274,860	274,860	FY20-FY23 Assumes full COLA amt from 17-19 bien
		<b>E</b>	59,402	59,402	59,402	59,402	59,402	\$467 per mo, per FTE
		<b>ED</b>	66,653	66,653	66,653	66,653	66,653	\$524 per mo, per FTE
		<b>EM</b>	5,000	5,000	5,000	5,000	5,000	Using \$5K as a base -ATG said work mostly related to just rules, lic, & cert.
		<b>G</b>	61,000	62,300	63,624	64,972	66,346	Using \$60K in FY19 plus 2% incr each yr, based on \$55,400 spent in FY16
		<b>N</b>	7,750	7,750	7,750	7,750	7,750	N/A
		<b>P</b>	3,180	3,180	3,180	3,180	3,180	\$25 per month, per FTE
		<b>TZ</b>	10,558	10,558	10,558	10,558	10,558	\$83 per month, per FTE
		<b>Total</b>	<b>1,206,801</b>	<b>1,209,973</b>	<b>1,211,297</b>	<b>1,212,645</b>	<b>1,214,019</b>	

**Source Document**  
OFM Salary Projection System  
OFM Salary Projection System  
2017-19 DSHS Staffing Model  
2017-19 DSHS Staffing Model  
9/21/17 Email from Office of Attorney General  
2015-17 AFRS Report  
N/A  
2017-19 DSHS Staffing Model  
2017-19 DSHS Staffing Model

G9222 - Substance Use Disorder Treatment Programs	<b>9.8</b>	<b>A</b>	752,744	758,838	758,838	758,838	758,838	FY20-FY23 Assumes full COLA amt from 17-19 bien
(Includes 50% of total Admin costs - PI G9221)	<b>1.6</b>	<b>B</b>	290,532	291,768	291,768	291,768	291,768	FY20-FY23 Assumes full COLA amt from 17-19 bien
		<b>E</b>	63,886	63,886	63,886	63,886	63,886	\$467 per mo, per FTE
		<b>ED</b>	71,683	71,683	71,683	71,683	71,683	\$524 per mo, per FTE
		<b>EM</b>	22,000	22,000	22,000	22,000	22,000	Using FY16 actual as a base amount
		<b>G</b>	64,000	65,360	66,745	68,156	69,593	Using \$63K in FY19 plus 2% incr each yr, based on amt spent at full staff
		<b>N</b>	7,750	7,750	7,750	7,750	7,750	N/A
		<b>P</b>	3,420	3,420	3,420	3,420	3,420	\$25 per month, per FTE
		<b>TZ</b>	11,354	11,354	11,354	11,354	11,354	\$83 per month, per FTE
		<b>Total</b>	<b>1,287,369</b>	<b>1,296,059</b>	<b>1,297,444</b>	<b>1,298,855</b>	<b>1,300,292</b>	

OFM Salary Projection System  
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2017-19 DSHS Staffing Model  
2017-19 DSHS Staffing Model  
9/21/17 Email from Office of Attorney General  
2015-17 AFRS Report  
N/A  
2017-19 DSHS Staffing Model  
2017-19 DSHS Staffing Model

Grand Total	<b>22.0</b>	<b>A</b>	1,471,457	1,479,108	1,479,108	1,479,108	1,479,108	FY20-FY23 Assumes full COLA amt from 17-19 bien
		<b>B</b>	565,077	566,628	566,628	566,628	566,628	FY20-FY23 Assumes full COLA amt from 17-19 bien
		<b>E</b>	123,288	123,288	123,288	123,288	123,288	\$467 per mo, per FTE
		<b>ED</b>	138,336	138,336	138,336	138,336	138,336	\$524 per mo, per FTE
		<b>EM</b>	27,000	27,000	27,000	27,000	27,000	Using FY16 actual as a base amount
		<b>G</b>	125,000	127,660	130,369	133,129	135,939	Using \$63K in FY19 plus 2% incr each yr, based on amt spent at full staff
		<b>N</b>	15,500	15,500	15,500	15,500	15,500	N/A
		<b>P</b>	6,600	6,600	6,600	6,600	6,600	\$25 per month, per FTE
		<b>TZ</b>	21,912	21,912	21,912	21,912	21,912	\$83 per month, per FTE
		<b>Total</b>	<b>2,494,170</b>	<b>2,506,032</b>	<b>2,508,741</b>	<b>2,511,501</b>	<b>2,514,311</b>	

OFM Salary Projection System  
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2017-19 DSHS Staffing Model  
2017-19 DSHS Staffing Model  
9/21/17 Email from Office of Attorney General  
2015-17 AFRS Report  
N/A  
2017-19 DSHS Staffing Model  
2017-19 DSHS Staffing Model



**APPENDIX B  
LICENSING CERTIFICATION PROGRAMS  
EST. REVENUES AND EXPENDITURES from FY 2019 thru FY 2023**

	<u>FTE</u>		<u>FY19</u>	<u>FY20</u>	<u>FY21</u>	<u>FY22</u>	<u>FY23</u>	<u>Comments</u>	<u>Source Document</u>
C9824 - Mental Health Treatment Programs Org Index C7B1	<b>9.0</b>	<b>A</b>	626,532	627,648	627,648	627,648	627,648	FY20-FY23 Assumes full COLA amt from 17-19 bien	OFM Salary Projection System
		<b>B</b>	236,172	236,400	236,400	236,400	236,400	FY20-FY23 Assumes full COLA amt from 17-19 bien	OFM Salary Projection System
		<b>E</b>	50,436	50,436	50,436	50,436	50,436	\$467 per mo, per FTE	2017-19 DSHS Staffing Model
		<b>ED</b>	56,592	56,592	56,592	56,592	56,592	\$524 per mo, per FTE	2017-19 DSHS Staffing Model
		<b>EM</b>	5,000	5,000	5,000	5,000	5,000	Using \$5K as a base -ATG said work mostly related to just rules, lic, & cert.	9/21/17 Email from Office of Attorney General
		<b>G</b>	60,000	61,200	62,424	63,672	64,946	Using \$60K in FY19 plus 2% incr each yr, based on \$55,400 spent in FY16	2015-17 AFRS Report
		<b>N</b>	0	0	0	0	0	No contract costs	N/A
		<b>P</b>	2,700	2,700	2,700	2,700	2,700	\$25 per month, per FTE	2017-19 DSHS Staffing Model
		<b>TZ</b>	8,964	8,964	8,964	8,964	8,964	\$83 per month, per FTE	2017-19 DSHS Staffing Model
<b>Total</b>		<b>1,046,396</b>	<b>1,048,940</b>	<b>1,050,164</b>	<b>1,051,412</b>	<b>1,052,686</b>			
G9222 - Substance Use Disorder Treatment Programs Org Index G7B1	<b>9.8</b>	<b>A</b>	660,563	666,216	666,216	666,216	666,216	FY20-FY23 Assumes full COLA amt from 17-19 bien	OFM Salary Projection System
		<b>B</b>	252,159	253,308	253,308	253,308	253,308	FY20-FY23 Assumes full COLA amt from 17-19 bien	OFM Salary Projection System
		<b>E</b>	54,919	54,919	54,919	54,919	54,919	\$467 per mo, per FTE	2017-19 DSHS Staffing Model
		<b>ED</b>	61,622	61,622	61,622	61,622	61,622	\$524 per mo, per FTE	2017-19 DSHS Staffing Model
		<b>EM</b>	22,000	22,000	22,000	22,000	22,000	Using FY16 actual as a base amount	9/21/17 Email from Office of Attorney General
		<b>G</b>	63,000	64,260	65,545	66,856	68,193	Using \$63K in FY19 plus 2% incr each yr, based on amt spent at full staff	2015-17 AFRS Report
		<b>N</b>	0	0	0	0	0	No contract costs	N/A
		<b>P</b>	2,940	2,940	2,940	2,940	2,940	\$25 per month, per FTE	2017-19 DSHS Staffing Model
		<b>TZ</b>	<u>9,761</u>	<u>9,761</u>	<u>9,761</u>	<u>9,761</u>	<u>9,761</u>	\$83 per month, per FTE	2017-19 DSHS Staffing Model
<b>Total</b>		<b>1,126,964</b>	<b>1,135,026</b>	<b>1,136,312</b>	<b>1,137,623</b>	<b>1,138,960</b>			
G9221 - Program Administration Org Index G7B1	<b>3.2</b>	<b>A</b>	184,362	185,244	185,244	185,244	185,244	FY20-FY23 Assumes full COLA amt from 17-19 bien	OFM Salary Projection System
		<b>B</b>	76,746	76,920	76,920	76,920	76,920	FY20-FY23 Assumes full COLA amt from 17-19 bien	OFM Salary Projection System
		<b>E</b>	17,933	17,933	17,933	17,933	17,933	\$467 per mo, per FTE	2017-19 DSHS Staffing Model
		<b>ED</b>	20,122	20,122	20,122	20,122	20,122	\$524 per mo, per FTE	2017-19 DSHS Staffing Model
		<b>EM</b>	0	0	0	0	0	No AG costs	N/A
		<b>G</b>	2,000	2,200	2,400	2,600	2,800	Very little travel in Admin	2015-17 AFRS Report
		<b>N</b>	15,500	15,500	15,500	15,500	15,500	Contracted Staff	2015-17 AFRS Report
		<b>P</b>	960	960	960	960	960	\$25 per month, per FTE	2017-19 DSHS Staffing Model
		<b>TZ</b>	<u>3,187</u>	<u>3,187</u>	<u>3,187</u>	<u>3,187</u>	<u>3,187</u>	\$83 per mo, per FTE	2017-19 DSHS Staffing Model
<b>Total</b>		<b>320,810</b>	<b>322,066</b>	<b>322,266</b>	<b>322,466</b>	<b>322,666</b>			
Total Licensing & Certification Program	<b>22.0</b>	<b>A</b>	1,471,457	1,479,108	1,479,108	1,479,108	1,479,108	FY20-FY23 Assumes full COLA amt from 17-19 bien	OFM Salary Projection System
		<b>B</b>	565,077	566,628	566,628	566,628	566,628	FY20-FY23 Assumes full COLA amt from 17-19 bien	OFM Salary Projection System
		<b>E</b>	123,288	123,288	123,288	123,288	123,288	\$467 per mo, per FTE	2017-19 DSHS Staffing Model
		<b>ED</b>	138,336	138,336	138,336	138,336	138,336	\$524 per mo, per FTE	2017-19 DSHS Staffing Model
		<b>EM</b>	27,000	27,000	27,000	27,000	27,000	ATG Estimated based on their 9/21/17 email from Paige Dietrich	ATG
		<b>G</b>	125,000	127,660	130,369	133,129	135,939	Total estimated travel	2015-17 AFRS Report
		<b>N</b>	15,500	15,500	15,500	15,500	15,500	Contracted staff	2015-17 AFRS Report
		<b>P</b>	6,600	6,600	6,600	6,600	6,600	\$25 per month, per FTE	2017-19 DSHS Staffing Model
		<b>TZ</b>	<u>21,912</u>	<u>21,912</u>	<u>21,912</u>	<u>21,912</u>	<u>21,912</u>	\$83 per mo, per FTE	2017-19 DSHS Staffing Model
<b>Total</b>		<b>2,494,170</b>	<b>2,506,032</b>	<b>2,508,741</b>	<b>2,511,501</b>	<b>2,514,311</b>			

**APPENDIX B  
LICENSING CERTIFICATION PROGRAMS  
EST. REVENUES AND EXPENDITURES from FY 2019 thru FY 2023**

**SFY14-SFY17 Lic & Cert Revenue\***

Current Doc Num	(Multiple Items)						
Sum of Amount	Column Labels						
Row Labels	2014	2015	2016	2017	Grand Total		
<b>Mental Health</b>	<b>238,223</b>	<b>319,808</b>	<b>306,126</b>	<b>375,427</b>	<b>1,239,584</b>	34 *1000	34000
<b>102700</b>							
MH Licensing & Certification	238,223	319,808	304,721	375,427	1,238,179		
<b>610000</b>							
Alcohol/Subs Abuse Cert Renewal Fee	0		1,405	0	1,405		
<b>Substance Use Disorder</b>	<b>602,157</b>	<b>618,719</b>	<b>660,247</b>	<b>576,431</b>	<b>2,457,554</b>		
<b>102700</b>							
MH Licensing & Certification	0	0		0	0		
<b>610000</b>							
Alcohol/Subs Abuse Cert Renewal Fee	568,457	601,719	607,047	541,181	2,318,404		
<b>620000</b>							
Alcohol/Subs Abuse Complaint Investigati	6,000	2,250	2,500	1,000	11,750		
<b>630000</b>							
Alcohol/Subs Abuse Cert Application Fee	27,700	14,750	50,700	34,250	127,400		
<b>Grand Total</b>	<b>840,381</b>	<b>938,527</b>	<b>966,373</b>	<b>951,858</b>	<b>3,697,138</b>	34	34000

\*Excludes revenue deferrals or transfers, if applicable

new SUD agencies	27.7	14.75	50.7	34.25
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